

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

July 8, 2020

BY EMAIL AND ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**RE: United States v. Mikal Leahr
20 Cr. 61 (RMB)**

Dear Judge Berman:

I write on behalf of my client, Mikal Leahr, with the consent of the Government, to respectfully request a 60-day adjournment of the conference in the above-referenced case.

We continue to be hampered in our ability to meet with Mr. Leahr, review discovery, and discuss his defense in this case as well as in our ability to collect necessary records and discuss a disposition with the government. In consequence, we respectfully request that the Court adjourn the conference currently scheduled for July 13 for 60 days to allow counsel and Mr. Leahr adequate time to prepare and discuss the case with each other and the Government.

The Government requests that time from July 13 until the adjourn date be excluded from any Speedy Trial calculations. On behalf of Mr. Leahr, I consent to that request. A similar request for an adjournment and the exclusion of time was made by all defendants in Mr. Leahr's case in front of Judge Stein, 19 Cr. 913 (SHS), and that case was adjourned to September 8.

Thank you for your time and consideration of this matter.

Conference is adjourned to 9/14/2020
at 9:00 am. Time is excluded pursuant
to the Speedy Trial Act for the reasons
set forth in this letter

SO ORDERED:

Date: 7/8/2020


Richard M. Berman, U.S.D.J.

Respectfully submitted,

/s/

Peggy Cross-Goldenberg
Supervising Trial Attorney
Federal Defenders of New York
646-588-8323
Peggy_cross-goldenberg@fd.org